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McCABE, WEISBERG & CONWAY, P.C.
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Attorneys for Movant: LoanCare, LLC

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Trenton Vicinage

IN RE: Peter C Bell
Edna M Bell aka Edna M Jones aka Edna
Jones Bell

Debtors

Case No.: 18-23437-MBK

Chapter: 13

Hearing Date: April 12, 2023
Time: 9:00 a.m.

Judge: Michael B. Kaplan

NOTICE OF MOTION FOR RELIEF FROM
THE AUTOMATIC STAY

TO:

Peter C Bell
8 Harrison Place
Manchester Township, New Jersey 08759

Edna M Bell aka Edna M Jones aka Edna
Jones Bell
902B N. New York Ave.
Atlantic City, New Jersey 08401

Joseph L. Youngblood
Youngblood Franklin
1201 New Road, Suite 230
Linwood, New Jersey 08221

Albert Russo, Trustee
Standing Chapter 13 Trustee
CN 4853
Trenton, New Jersey 08650-4853

DEAR SIRS AND MADAMS:

PLEASE TAKE NOTICE that on April 12, 2023 at 9:00 a.m., or as soon as counsel may be heard, the undersigned attorney for the secured creditor, **LoanCare, LLC**, will move before the United States Bankruptcy Court, District of New Jersey, for an Order Vacating the Automatic

Stay with respect to property known as 8 Harrison Place, Township Of Manchester, New Jersey 08759, to commence or continue its foreclosure action, by reason of the failure of the Debtors to make regular monthly mortgage payments outside their Chapter 13 Plan.

PLEASE TAKE FURTHER NOTICE that if you wish to contest this motion, you must file a written response with the Clerk of the Bankruptcy Court and serve a copy of the responding papers upon the undersigned at least seven (7) days before the date of the hearing.

PLEASE TAKE FURTHER NOTICE that the moving party avers that no brief is necessary as the matter does not involve complex legal issues.

PLEASE TAKE FURTHER NOTICE that the undersigned hereby waives oral argument and relies upon the Certifications in support of this motion unless the matter is contested.

Date: March 17, 2023

McCABE, WEISBERG & CONWAY, LLC

/s/ Andrew M. Lubin
Andrew M. Lubin, Esquire